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IN THE UNITED STATES DISTRICT COURT FOR
SOUTHERN DISTRICT OF NEW YORK
(FOLEY SQUARE-DIVISION)

JUAN TACURI

Defendant,

v.

Case No.1:22-cr-00622-AT-2

(Honor. Analisa Torres)

UNITED STATES OF AMERICA

Respondent.

MOTION TO REQUEST THE COURT NOT BE TRANSFERED

NOW BEFORE THE COURT comes JUAN TACURI, and moves as follows:

Petitioner prays that this Motion be liberally construed and held to a standard "less stringent than those drafted by Attorneys." Haines v. Kerner, 404 U.S. 519,520 (SCOTUS 1972); See also Ayala Serrano v. Gonzalez, 909 F.2d 8,15(1st Cir.)1991). According to Rule 56(a) of the Federal Rules of Civil Procedures, a Movant may move for any claim if he shows that there is no general dispute as to any material fact and that he is entitled to judgement as a matter of law.

1.

Petitioner request always very respectfully to this Court to issue an order to the U.S. Marshalls to not move Petitioner from MDC Brooklyn as Petitioner is pending the appointing of his Appeal Attorney for the Court and it will be in the Interest of Justice to keep Petitioner close to his appointed Attorney as Petitioner has a lot of matters to analyze and discuss from Petitioner case for his appeal with the appointed Attorney, being moved from a place close to be in contact with his

Attorney will put Petitioner in the same situation as with his prior Counselor at the pre-trial stage of his case, Attorney Gaviria was based in Miami, Florida and this impeded Petitioner to have a full and complete defense.

2.

WHEREFORE PLAINTIFF PRAYS that this Honorable Court grant his motion to order the U.S. Marshalls not to move Petitioner from FDC Brooklyn based on the above explained.

Respectfully Submitted,



Juan Tacuri
Register No.36063-510
MDC Brooklyn
Metropolitan Detention Center
P.O. Box 329002
Brooklyn, NY 11232

DENIED. The Clerk of Court is respectfully directed to mail a copy of this letter to Defendant *pro se*.

SO ORDERED.

Dated: December 3, 2024
New York, New York



ANALISA TORRES
United States District Judge